

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STATE OF WASHINGTON, et al.,

NO.

Plaintiffs,

DECLARATION OF IREM TUMER

V.

DONALD J. TRUMP, in his official capacity as President of the United States of America, et al.,

Defendants.

1 I, Irem Turner, declare as follows

2 1. I am over the age of 18, competent to testify as to the matters herein, and attest to
 3 the information set forth below through personal knowledge as well as through Oregon State
 4 University personnel who have assisted me in gathering this information from our institution.

5 2. I earned my Bachelor of Science and Doctor of Philosophy in Mechanical
 6 Engineering from the University of Texas at Austin.

7 3. I am the Vice President for Research and Innovation at Oregon State University.

8 4. Oregon State University enrolls more than 37,000 students and employs more
 9 than 6,000 individuals on a full-time equivalent basis. It is the land grant university of the State
 10 of Oregon, a Carnegie Classification of Institutions of Higher Education Research I designated
 11 institution, and one of three land, sea, space and sun grant universities in the United States.

12 5. As Vice President for Research and Innovation, I lead all aspects of the research
 13 enterprise for the University.

14 **Familiarity with the Executive Order**

15 6. I am aware that President Trump issued an Executive Order on January 28, 2025
 16 characterizing certain aspects of gender affirming care as “chemical and surgical mutilation” and
 17 directing the heads of federal executive departments and agencies to take immediate steps to
 18 ensure that institutions receiving Federal research or education grants stop providing gender
 19 affirming care to individuals under 19 years of age.

20 7. I am aware that Oregon State University provides medical care through its
 21 Student Health Services that enables students to continue to pursue their education while
 22 undergoing medical treatment, including gender affirming care.

23 8. I am aware that, on February 3, 2025, the White House issued a statement
 24 claiming that certain health institutions, including those that are part of or affiliated with
 25 universities, have stopped or are considering stopping providing gender affirming care to patients

1 under 19 years of age citing the potential loss of Federal research and educational funds as a
 2 result of the Executive Order.

3 9. Without conceding that Oregon State University's Student Health Services is a
 4 "medical institution" as that term is defined under Section 4 of the Executive Order, I think it
 5 likely that the broad language and lack of definitions for key terms will result in relevant agencies
 6 interpreting the language in such a manner, and requiring Oregon State University to choose
 7 between providing needed medical care to its students, and receiving research and education
 8 funding critical to its mission.

9 **Research & Education Grants at Oregon State University**

10 10. Oregon State University houses a robust research program, with internationally
 11 recognized faculty, and its impact reaches throughout the state of Oregon, the nation and the
 12 world to address global challenges.

13 11. Research done at OSU creates knowledge that leads to innovations, commercial
 14 products, and services and supports launch and growth of research-based startups in fields such
 15 as medicine and energy storage.

16 12. In fiscal year 2024 (July 1, 2023-June 30, 2024), OSU received \$371,000,000 in
 17 federal research awards. In the first six months of fiscal year 2025 (beginning July 1, 2024) OSU
 18 has received \$186,746,901 in federal research awards, averaging more than \$31,000,000 per
 19 month from 20 different federal departments and agencies.

20 13. Significant public benefit flows from federally funded research performed at
 21 Oregon State University. Some recent examples include: (1) National Institutes of Health grant
 22 funding to research the use of microfluidics to achieve a personalized-medicine breakthrough
 23 for people with epilepsy; (2) National Eye Institute grant funding that resulted in the
 24 development of a new type of material capable of reaching the lungs and the eyes, which is an
 25 important step forward in genetic therapy for hereditary conditions like cystic fibrosis, and
 26 inherited vision loss; and (3) Research funded by the USDA, the U.S. Army Medical Research

1 and Material Command, and the National Cancer Institute that discovered a novel way to make
2 breast cancer cells die.

3 14. Federal awards are the driving force behind Oregon State University's success in
4 advancing research of utmost importance to the state of Oregon, the nation, and the world, and
5 to attracting and developing excellent faculty and students that make the work possible. Even a
6 temporary pause on the issuance of new awards and on the disbursement of federal funds for
7 open awards would have broad impacts on the work of the university

8 15. If the federal government were to stop providing research and education grants
9 to Oregon State University, the impacts would be devastating to its operations and disrupt critical
10 research in areas such as integrated health and biotechnology, robotics, agriculture, food and
11 beverages, semiconductors and artificial intelligence.

12 16. I am not aware of Oregon State University having ever received federal grant
13 funding contingent upon it not providing a particular type of medical treatment or medical care
14 through its Student Health Services.

15 I declare under penalty of perjury under the laws of the Oregon and the United States of
16 America that the foregoing is true and correct.

17 DATED this 5th day of February 2025, at Barcelona, Spain.

DocuSigned by:

Irem Turner
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